

PLEASE TAKE NOTICE that the estates of BlockFi Inc. and its debtor affiliates (the “Debtors” or, the “Wind-Down Debtors” as applicable), by and through its proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 for entry of an order substantially in the form submitted herewith for authority to redact and file under seal (the “Motion to Seal”), in part, (i) Exhibit A (the “Settlement Agreement”) to the *Wind-Down Debtors’ Motion for an Order (I) Authorizing and Approving the Settlement and Release of Claims and Causes of Action By and Among the Wind-Down Debtors and 3AC and (II) Granting Related Relief* (the “9019 Motion”), (ii) those portions of the 9019 Motion quoting or referencing certain commercially sensitive information contained within the Settlement Agreement (the “Sealed Portions”) and (iii) granting the Wind-Down Debtors such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion to Seal will be held on February 6, 2024 at 10:00 a.m. (ET) or as soon thereafter as counsel may be heard before Judge Kaplan at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8.

PLEASE TAKE FURTHER NOTICE that the Wind-Down Debtors will be relying on the Motion to Seal and that no brief is being filed since the legal basis upon which relief should be granted is set forth in the motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a)(2), any objections must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova

Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey **so**
they are received on_____.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested in the Motion to Seal may be granted without further notice.

Respectfully Submitted,

Dated: January 18, 2024

/s/ Donald W. Clarke

GENOVA BURNS LLC

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